

1           **SAO**  
2           MARJORIE HAUF, ESQ.  
3           Nevada Bar No. 8111  
4           **JEFFREY GALLIHER, ESQ.**  
5           Nevada Bar No. 8078  
6           **GANZ & HAUF**  
7           8950 W. Tropicana, Suite 1  
8           Las Vegas, NV 89147  
9           Tel: (702) 598-4529  
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11          Attorneys for Plaintiff

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9           **UNITED STATES DISTRICT COURT**  
10          **DISTRICT OF NEVADA**

11          JUDY DONATELL, individually; JUDY  
12          DONATELL, as Special Administrator of the  
13          Estate of ANGELA DAWN DONATELL,  
14          deceased; JUDY DONATELL, as the  
15          Guardian Ad Litem for X.M., a  
16          minor, under 14 years of age,

17          Plaintiffs,  
18          v.  
19          THE CITY OF LAS VEGAS, a political  
20          subdivision of the State of Nevada; *et al.*

21          Defendants

22          CASE NO.: 2:15-CV-02334-RFB-NJK

23          **STIPULATION AND ORDER TO**  
24          **EXTEND THE TIME FOR PLAINTIFF**  
25          **TO FILE OPPOSITION TO**  
26          **DEFENDANT CITY OF LAS VEGAS'**  
27          **MOTION FOR SUMMARY**  
28          **JUDGEMENT [ECF 112]**  
             **(FORTH REQUEST)**

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30          COMES NOW Plaintiff, JUDY DONATELL, INDIVIDUALLY; JUDY DONATELL, AS  
31          THE SPECIAL ADMINISTRATOR OF THE ESTATE OF ANGELA DAWN DONATELL  
32          DECEASED; JUDY DONATELL, AS THE GUARDIAN AD LITEM FOR X.M., A MINOR,  
33          UNDER 14 YEARS OF AGE ("Plaintiff") and Defendants CITY OF LAS VEGAS, MICHELE  
34          FREEMAN, LIEUTENANT RUSSELL, SERGEANT AVILA, SERGEANT M. BUNNELL,  
35          SERGEANT B. BYARD, OFFICER R. DORADO, OFFICER AMANDA CHALMERS,  
36          OFFICER TRACEY VALENZUELA, OFFICER A. KNIGHT, OFFICER JONATHAN  
37          McCORMICK, OFFICER ALGIN BROOKS, OFFICER RAMON BROOKINS, OFFICER  
38          YANNIS GIRON, OFFICER LANDROVE, OFFICER BLEDSOE, OFFICER RANDALL

1 (“Defendant City of Las Vegas), by and through their undersigned counsel of record, and hereby  
2 jointly stipulate that the Plaintiff’s Opposition to Defendant City of Las Vegas’ Motion for  
3 Summary Judgment, filed on August 24, 2017 [ECF 112], currently due January 2, be extended an  
4 additional (30) days up to and including Tuesday, January 30, 2018.

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6 On November 3, 3017, this Court granted 60-day extension of time for Plaintiff to file her  
7 Oppositions to Defendant City of Las Vegas’ Motion for Summary Judgment [EFC 112] and  
8 Defendants Correct Care Solutions, *et al.*’s (“Defendant CCS”) Motion for Summary Judgment  
9 [EFC 113] to allow Plaintiff’s counsel to obtain the entire care file from the former counsel’s  
10 office. While the entire case file was obtained on or about December 4, 2017, and Plaintiff’s  
11 counsel diligently working on responding to Defendant City of Las Vegas’ Motion for Summary  
12 Judgment, Plaintiffs’ counsel has been unable to complete the Response due to a family tragedy.  
13 Plaintiff’s counsel, however, will timely file Plaintiff’s Opposition to Defendant CCS’ Motion for  
14 Summary Judgment. [EFC 113]

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1           This request for extension is made in good faith and not for the purpose of delay.

2           WHEREFORE, the parties respectfully request that Plaintiff's Opposition to Defendant  
3 City of Las Vegas' Motion for Summary Judgment be extended an additional (30) thirty days up to  
4 including Tuesday, January 30, 2018.

5           APPROVED AS TO FORM AND CONTENT.  
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7           Dated this 28th day of December 28, 2017.

7           Dated this 28th day of December 28, 2017.

8           GANZ & HAUF  
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LAS VEGAS CITY ATTORNEY

10           \_\_\_\_\_  
11           /s/ Jeffrey L. Galliher  
12           MARJORIE HAUF, ESQ.  
13           Nevada Bar No. 8111  
14           JEFFREY L. GALLIHER, ESQ.  
15           Nevada Bar No. 8078  
16           8950 W. Tropicana Ave., Ste. 1  
17           Attorneys for PLAINTIFFS

18           \_\_\_\_\_  
19           /s/ Philip R. Byrnes  
20           PHILIP R. BYRNES, ESQ.  
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22           495 S. Main Street, 6th Floor  
23           Las Vegas, Nevada 89101  
24           Attorney for CITY DEFENDANTS

25           **ORDER**



26           \_\_\_\_\_  
27           RICHARD F. BOULWARE, II  
28           United States District Judge  
29           DATED this 25th day of January, 2018.